BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)
)
SIERRA CLUB, ENVIRONMENTAL)
LAW AND POLICY CENTER,)
PRAIRIE RIVERS NETWORK, and)
CITIZENS AGAINST RUINING THE)
ENVIRONMENT)
)
Complainants,)
)
V.)
)
MIDWEST GENERATION, LLC,)
)
Respondents)
•	

PCB No-2013-015 (Enforcement – Water)

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE that I have filed the following Appearance and Verified

Statement pursuant to Illinois Supreme Court Rule 707 of Megan Wachspress before the Illinois

Commerce Commission in the above-captioned case today, copies of which are hereby served

upon you.

•

faith E. Bugel

Faith Bugel Attorney at Law 1004 Mohawk Rd. Wilmette, IL 60091 Ph. (312) 282-9119 ARDC No: 6255685

Dated: April 26, 2023

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
SIERRA CLUB, ENVIRONMENTAL LAW AND POLICY CENTER, PRAIRIE RIVERS NETWORK, and)))	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT)	
Complainants,))	PCB No-2013-015 (Enforcement – Water)
V.	ý	
MIDWEST GENERATION, LLC,))	
Respondents)	

APPEARANCE OF MEGAN WACHSPRESS

AND CONSENT TO EMAIL SERVICE

I hereby enter my appearance on behalf of Complainant Sierra Club. I authorize the

service of documents on me by electronic mail in lieu of receiving paper documents in the

above-captioned proceeding. My e-mail address to receive service of documents is as follows:_

megan.wachspress@sierraclub.org.

<u>/s/ Megan Wachspress</u> Megan Wachspress

Dated: April 26, 2023

Megan Wachspress Staff Attorney, Sierra Club Environmental Law Program 2101 Webster St., Suite 1300 Oakland, CA 94612 Ph: (415) 977-5635 <u>megan.wachspress@sierraclub.org</u>

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
)	
SIERRA CLUB, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT)	
)	PCB No-2013-015
Complainants,)	(Enforcement – Water)
L C)	、 、
V.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

VERIFIED STATEMENT OF MEGAN WACHSPRESS PURSUANT TO ILLINOIS SUPREME COURT RULE 707

I, Megan Wachspress, submit this Verified Statement pursuant to Illinois Supreme Court Rule 707.

1. My full name is Megan Claire Wachspress. The address of offices from which I practice law and related email address and telephone numbers are as follows:

2101 Webster St., Suite 1300Oakland, CA 94612(415) 977-5635megan.wachspress@sierraclub.org

- 2. I represent Sierra Club in: Case No. 13-15 before the Illinois Commerce Commission.
- 3(a). I have not filed any other appearance pursuant to this rule during this calendar year. Previously, I have filed an appearance in Pollution Control Board Case No. 2019-078 on February 11, 2020, and in the Illinois Commerce Commission Case No 20-0778 on May 20, 2021.
- 3(b). My ARDC registration number is 6337328. I will be appearing in association with Faith Bugel, who is licensed and registered to practice before the Illinois State Bar Association (ARDC No. 6255685), and has submitted an Entry of Appearance before the Pollution Control Board in this case on July 15, 2015.

4(a). I list each jurisdiction of admission, including any state, territory, or commonwealth of the United States, the District of Columbia, or in a foreign country, and my full admission name and license number.

The State Bar of California, Megan Claire Wachspress, Bar No. 310558.

- 4(b). I have attached a letter or certificate of good standing for the jurisdictions listed in paragraph 4(a) above, current as of January 6, 2023.
- 5. I have no office or other presence in Illinois for the practice of law.
- 6. I submit to the disciplinary authority of the Supreme Court of Illinois.
- 7. I have undertaken to become familiar with and to comply, as if admitted to practice in Illinois, with the rules of the Supreme Court of Illinois, including the Illinois Rules of Professional Conduct and the Supreme Court Rules on Admission and Discipline of Attorneys, and other Illinois law and practices that pertain to the proceeding.
- 8. I certify that I have served this Statement upon the Illinois Commerce Commission Hearing Officer, Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois, and counsel for Complainants, Respondents, and Intervenors and that these parties are all entitled to service under this rule.

I verify the accuracy and completeness of each of the above statements.

Dated: April 26, 2023

/s/ Megan Wachspress

Megan Wachspress Staff Attorney Sierra Club Environmental Law Program 2101 Webster Street, Ste. 1300 Oakland, CA 94612 Phone: (415) 977-5635 Email: megan.wachspress@sierraclub.org



The State Bar of California

OFFICE OF ATTORNEY REGULATION & CONSUMER RESOURCES

180 Howard Street, San Francisco, CA 94105

AttorneyRegulation@calbar.ca.gov 888-800-3400

CERTIFICATE OF STANDING

January 6, 2023

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MEGAN CLAIRE WACHSPRESS, #310558 was admitted to the practice of law in this state by the Supreme Court of California on July 20, 2016 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Alex Calderon Custodian of Records

CERTIFICATE OF SERVICE

The undersigned, Faith E. Bugel, an attorney, certifies that I have served electronically upon the Clerk and by email upon the individuals named on the attached Service List a true and correct copy of the **APPEARANCE OF MEGAN WACHPRESS** and **VERIFIED STATEMENT OF MEGAN WACHPRESS** before 5 p.m. Central Time on April XX, 2023, to the email addresses of the parties on the attached Service List. The entire filing package, including exhibits, is 7 pages.

Respectfully submitted,

Faith C. Bugel

Faith E. Bugel 1004 Mohawk Wilmette, IL 60091 <u>fbugel@gmail.com</u>

PCB 2013-015 SERVICE LIST:

Cantrell Jones Environmental Law and Policy Center 35 E. Wacker Dr., Suite 1600 Chicago, IL 60601 (312) 673-6500 cjones@elpc.org

Abel Russ Environmental Integrity Project 1000 Vermont Ave. NW, Suite 1100 Washington, DC 20005 (202) 263-4453 aruss@environmentalintegrity.org

James M. Morphew Sorling Northrup Keith I. Harley Greater Chicago Legal Clinic, Inc. 211 West Wacker Drive, Suite 750 Chicago, IL 60606 (312) 726-2938 <u>kharley@kentlaw.edu</u>

Jennifer T. Nijman Susan M. Franzetti Kristen Laughridge Gale Kelly Emerson Nijman Franetti LLP 10 South LaSalle St., Suite 3400 Chicago, IL 60603 (312) 251-5250 jn@nijmanfranzetti.com sf@nijmanfranzetti.com kg@nijmanfranzetti.com

Don Brown – Clerk of the Board Illinois Pollution Control Board 1 North Old State Capitol Plaza, Suite 200 P.O. Box 5131 Springfield, IL 62705 (217) 544-1144 jmmorphew@sorlinglaw.com

Brad Halloran, Hearing Office Illinois Pollution Control Board 100 W. Randolph St., Suite 11-500 Chicago, IL 60601k (312) 814-3620 Brad.halloran@illinois.gov

Melissa S. Brown HeplerBroom LLC 4340 Acer Grove Drive Springfield, IL 62711 (217) 523-4900 Melissa.brown@heplerbroom.com

April 25, 2023

100 W. Randolph St., Suite 11-500 Chicago, IL 60601k (312) 814-3620 Don.brown@illinois.gov

Albert Ettinger Law Firm of Albert Ettinger 7100 N. Greenview Chicago, IL 60606 (773) 818-4825 Ettinger.albert@gmail.com